



RECEIVED

JUL 15 2016

Director's Office  
Division of Fire and Life Safety

July 14, 2016

Lloyd Nakano  
Deputy Director  
5700 East Tudor Road  
Anchorage, AK 99507  
Lloyd.nakano@alaska.gov

RE: AK 4802 2016 - Proposed Regulation Changes

Deputy Nakano:

The Alaska Campground Owners Association (ACOA) is a member owned non-profit that represents privately-owned campgrounds throughout Alaska. ACOA is requesting consideration in extending the comment deadline for the proposed regulation changes of mist fire suppression systems described in AK 4802 2016 beyond July 29, 2016.

We feel the timing of this public comment period is not optimal for our members that will be affected by these regulations, as they are focused on operating seasonal businesses. We are respectfully requesting an extension of 30 or more days that would allow our members a more adequate opportunity to review and provide meaningful public response to the proposed amendments related to AK 4802 2016.

Sincerely,

A handwritten signature in blue ink that reads "Shannon Miller".

Shannon Miller  
ACOA  
PO Box 111005  
Anchorage, AK 99511  
(907)351-3785  
alaskacampgrounds@gmail.com

Cc: ACOA Board Members  
Sarah Leonard, ATIA  
Colleen Stephens, ATIA Board Chair  
Jeff Sims, ARVC  
Scott Reisland



THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

## Department of Public Safety

DIVISION OF FIRE AND LIFE SAFETY  
Office of the Director

5700 East Tudor Road  
Anchorage, Alaska 99507-1225  
Main: 907.269.5491  
Fax: 907.338.4375

July 21, 2016

Shannon Miller  
Alaska Campground Owners Association  
PO Box 111005  
Anchorage, AK 99511

Ms. Miller:

In May 2014, the 2012 proposed revisions were open for public comment for over 60 days. However, the 2012 proposed revisions were withdrawn on August 1, 2014, due to public comments on cabins, fire sprinkler system. In 2014, we met with the Alaska Travel Industry Association and Alaska Campground Owners Association to brief them on the 2012 proposed revisions.

We demonstrated that the requirements at issue were already adopted and we are easing the requirement by raising the threshold from one to six cabins. It applies to new construction only and there is no retroactive provision. The fire suppression system is only applicable to locations with a potable water system and the suppression system meets the most simplistic of systems as referenced in NFPA 13 D.

The NFPA 13D fire sprinkler system means domestic and it is interconnected with the residential plumbing system. This is only when a cabin has a potable water system and it can be installed by a plumber. The current adopted regulations for fire sprinkler systems in R-1 type occupancies, to include cabins, are more restrictive than the 2012 proposed revisions.

The water mist fire suppression systems aren't applicable and have higher costs than a NFPA 13D fire sprinkler system. The water mist systems are only used in industrial/educational applications and can be used on a case by case basis to replace a commercial fire sprinkler system when the water supply cannot meet the fire demand.

Currently, a plan review is required for any Bed and Breakfast that has more than five rental rooms/cabins or if the owner doesn't use the building as their primary residence. It will be considered a commercial building under Alaska Statute 18.70.080(a)(2). This is less stringent than the Alaska Statute 18.70.080(a)(2) fire and life safety criteria for all commercial, industrial,

business, institutional, or other public buildings, and buildings used for residential purposes containing four or more dwelling units.

We understand Park Model RV's are built to ANSI A119.5 Standards. However, there are many variables for Park Model RV's. It depends on how the Park Model RV's are being used. When detailed information, such as the type of occupancy (Residential R-1 or R-2, length of stay (less than 30 days or 30 or more days), etc., are provided we can determine if a plan review is required or not.

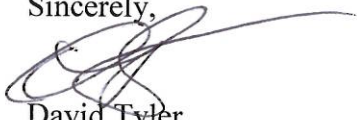
The vast majority of our customers want us to complete the adoption of the 2012 proposed revisions. In fact we currently are approving modifications from the 2009 code to the 2012 code because the state is behind in getting them adopted. Alaska should have already adopted the 2015 codes.

This is the second 60 day comment period we have held for the adoption of the 2012 code. We are willing to discuss any changes you may want to see with these codes, but are not going to extend the comment period. However, immediately upon adoption of the 2012 code we will begin the process of adopting the 2015 code, which as I mentioned is also overdue. At that time we can address any unresolved issues that you may have.

Alaska does have a fire life loss problem and it does occur in simple rental cabins. We, like you, want the safest and most enjoyable environment for people to enjoy our great state.

I thank you for your communication. If you would like to discuss this further I am more than willing to meet with any interested parties.

Sincerely,

A handwritten signature in dark ink, appearing to read "David Tyler", with a stylized flourish extending to the right.

David Tyler  
Alaska State Fire Marshal